

April 1, 2025

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: Tantaros v. Fox News Network, LLC, et al. - Case No. 1:25-cv-961 (VSB)

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**Letter Motion Urging Expedited Ruling on Emergency TRO Petition, Permanent Injunction and Remand to Federal Court**

Dear Judge Broderick:

Petitioner Andrea K. Tantaros respectfully submits this letter motion to urge the Court to issue a ruling on her Emergency Petition for a Temporary Restraining Order and Permanent Injunction (See ECF No. 1, 6), which is now fully briefed as of March 28, 2025.

Petitioner filed the Emergency Petition on February 3, 2025—over 60 days ago—due to urgent, novel violations of the Federal Arbitration Act, irreparable economic, professional and personal reputational harm, breaches to Petitioner’s arbitration clause and jurisdictional impropriety given Respondent Fox News Network, LLC’s prohibition from utilizing mandatory arbitration to adjudicate claims. Despite two supplemental letters and formal filings, the Petition remains unresolved.

Since the initial filing, the AAA arbitration panel has continued issuing orders, including a post-filing “interim judgment” dated February 7, 2025, and a new briefing schedule (issued via email on March 10, 2025). These actions occurred after Petitioner submitted a cease-and-desist letter and litigation hold notice, citing federal case law and Southern District of New York jurisdiction.

The arbitrators’ continued activity, including the refusal to stay proceedings, violates Supreme Court precedent and further exacerbates the irreparable harm outlined in Petitioner’s filings. *See First Options of Chicago, Inc. v. Kaplan*, 514 U.S. 938 (1995); *Howsam v. Dean Witter Reynolds, Inc.*, 537 U.S. 79 (2002).

Petitioner submits a sworn declaration in support of this request, detailing post-filing arbitrator misconduct, failure to preserve electronic records and review evidence, schedule hearings, depositions and oral arguments and their continued attempts to adjudicate the matter outside this Court’s jurisdiction with accompanying exhibits as evidentiary support to preserve the record. After nine years of dilatory, purposeful protraction of the arbitration constituting both an abuse

of process and added retaliation through lawfare to exhaust Petitioner financially and emotionally, the arbitrators have demonstrably performed a sharp about-face and accelerated their actions at Respondents' behest following Petitioner's filing in this Court raising additional concerns about arbitrator bias and misconduct.

In light of the procedural status, and the serious pattern and practice of ongoing harm documented in the Court's record, Petitioner respectfully requests that the Court expedite its nruling on the Emergency TRO Petition without further delay.

Respectfully submitted,

/s/ Andrea K. Tantaros

Andrea K. Tantaros

Pro Se Petitioner